

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
- v. -	:	CONSENT PRELIMINARY ORDER
	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
DOMINICK BLYDEN,	:	
	:	24 Cr. 479 (LTS)
Defendant.	:	
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WHEREAS, on or about August 13, 2024, DOMINICK BLYDEN (the “Defendant”), among others, was charged in four counts of a seven-count Indictment, 24 Cr. 479 (LTS) (the “Indictment”), with conspiracy to possess and sell stolen vehicles in violation of Title 18, United States Code, Section 371 (Count One); possession and sale of stolen motor vehicle in violation of Title 18, United States Code, Sections 2313 and 2 (Count Three); conspiracy to commit wire fraud in violation of Title 18, United States Code, Section 1349 (Count Six); and wire fraud in violation of, Title 18, United States Code, Sections 1343 and 2 (Count Seven);

WHEREAS, the Indictment included a forfeiture allegation as to Count Three, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(5), of any and all property, real and personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, from the commission of the offense charged in Count Three of the Indictment, including but not limited to a sum of money in United States currency representing the amount of gross proceeds traceable to the commission of the offense charged in Count Three of the Indictment;

WHEREAS, on or about May 1, 2025, the Defendant pled guilty to Count Three of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count Three of the Indictment and agreed to

forfeit to the United States, pursuant to Title 18, United States Code Section 982(a)(5), a sum of money equal to \$250,000 in United States currency, representing the proceeds traceable to the commission of the offense in Count Three of the Indictment;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$250,000 in United States currency, representing the amount of proceeds traceable to the offense charged in Count Three of the Indictment;

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense charged in Count Three of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Jay Clayton, United States Attorney, Assistant United States Attorney Getzel Berger, of counsel, and the Defendant, and his counsel, Jacob Kaplan, Esq., that:

1. As a result of the offense charged in Count Three of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$250,000 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offense charged in Count Three of the Indictment that the Defendant personally obtained, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant DOMINICK BLYDEN and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable to United States Customs and Border

Protection, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38<sup>th</sup> Floor, New York, New York 10278 and shall indicate the Defendant's name and case number.

4. Upon entry of this Consent Preliminary Order of Forfeiture/Money Judgment, and pursuant to Title 21, United States Code, Section 853, United States Customs and Border Protection, or its designee the Office of Fines, Penalties, and Forfeiture, shall be authorized to deposit the payment on the Money Judgment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

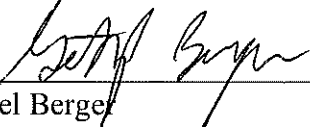
6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

JAY CLAYTON  
United States Attorney for the  
Southern District of New York


By:   
Getzel Berger  
Assistant United States Attorney  
26 Federal Plaza  
New York, NY 10278  
(212) 637-1061

DATE 5/1/25

DOMINICK BLYDEN

By:   
DOMINICK BLYDEN

DATE 5/1/25

By:   
JACOB KAPLAN, ESQ.  
Attorney for Defendant  
256 Fifth Avenue  
New York, NY 10001

DATE 5/1/25

SO ORDERED:

  
HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE

DATE 5/1/2025